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January 13, 2004

The Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Application of First Volunteer Services, Inc for a Certificate of Public
Convenience and Necessity to Provide Competing Telecommunications Services
within the State of Tennessee

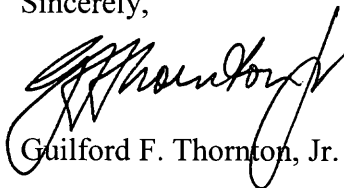
TRA Docket No. 03-00607

Dear Chairman Tate:

I am enclosing with this letter an original and thirteen copies of Citizens
Telecommunications Company's ("Citizens") petition to intervene in the above referenced
matter. A copy has been served on counsel for Volunteer First Services, Inc.

Should you have any questions or require anything further at this time, please do not
hesitate to contact me.

Sincerely,



Guilford F. Thornton, Jr.

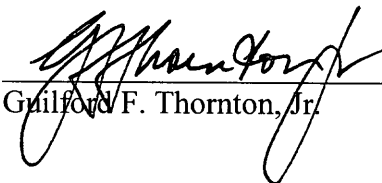
cc: Mike Swatts
Gregg Sayre

RECEIVED
T.R.A. DOCKET ROOM
JAN 19 3 11 PM '04

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by facsimile transmission and by hand delivery this the 13th day of January, 2004 to:

D. Billye Sanders
Waller Lansden Dortch & Davis
Suite 2100
Nashville City Center
511 Union Street
Nashville, TN 37219-8966



Guilford F. Thornton, Jr.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: APPLICATION OF VOLUNTEER)
FIRST SERVICES, INC. FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY)
TO PROVIDE COMPETING)
TELECOMMUNICATIONS SERVICES)
WITHIN THE STATE OF TENNESSEE)

Docket No. 03-00607

**PETITION TO INTERVENE OF CITIZENS TELECOMMUNICATIONS
COMPANY OF TENNESSEE, LLC**

Pursuant to T.C.A. § 4-5-310 and T.C.A. § 65-2-107 and TRA Rule 1220-1-1-.08, Citizens Telecommunications Company of Tennessee, LLC ("Citizens") petitions the Tennessee Regulatory Authority (the "TRA") to intervene as a party in the above-captioned proceeding.

In support of this Petition, Citizens states as follows:

1. Citizens is a certificated incumbent local exchange carrier ("ILEC") as defined in T.C.A. § 65-4-101, serving customers in White, Warren, Weakley, Putnam, and Cumberland counties in Tennessee.. Citizens is regulated by the TRA pursuant to T.C.A. §§ 65-4-101 and 65-4-104.

2. Volunteer First Services, Inc. ("VFS") has filed a Petition in the above-captioned docket that seeks authority to provide local and interchange telecommunications services with in the State of Tennessee. According to Section 4 of VFS's Petition, VFS "intends to serve customers in the greater Crossville area." This area is served by Citizens. Accordingly, Citizens' legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding.

3. According to VFS's Petition, 50% of the stock of VFS is owned by Ben Lomand Rural Telephone Cooperative, Inc. ("Ben Lomand"), which is a telephone cooperative as defined

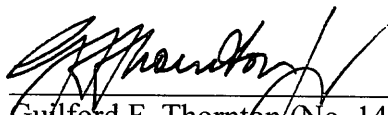
by T.C.A. § 65-29-102. Ben Lomand serves customers in White, Warren, Van Buren, Grundy, and portions of Franklin, Coffee and Bedford counties in Tennessee.

4. Ben Lomand also owns Ben Lomand Communications, Inc. ("BLC"), which is a competing local telephone exchange company ("CLEC") in Warren and White counties, which counties also are served by Citizens. BLC is competing aggressively with Citizens in Warren and White Counties.

Accordingly, Citizens' legal rights, duties, privileges, immunities or other legal interests or responsibilities may be affected by the outcome of this proceeding. Further, granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

WHEREFORE, Citizens asks that his Petition to Intervene be granted by the Authority.

Respectfully submitted,



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Charles W. Cook, III (No. 14274)
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Company of Tennessee, LLC